

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>Mark S. Horoupian (CA Bar No. 175373) mhoroupian@sulmeyerlaw.com Steven F. Werth (CA Bar No. 205434) swerth@sulmeyerlaw.com SulmeyerKupetz A Professional Corporation 333 South Grand Avenue, Suite 3400 Los Angeles, California 90071 Telephone: 213.626.2311 Facsimile: 213.629.4520</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Howard M. Ehrenberg, Chapter 7 Trustee</p>		<p>FOR COURT USE ONLY</p>	
<p><b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION</b></p>			
<p>In re:</p> <p>RAYMOND EXPRESS INTERNATIONAL, LLC,</p> <p>Debtor(s).</p>		<p>CASE NO 2:18-bk-11909-ER CHAPTER: 7</p> <p><b>NOTICE OF SALE OF ESTATE PROPERTY</b></p>	

<b>Sale Date:</b> December 9, 2020	<b>Time:</b> 10:00 a.m.
<b>Location:</b> Courtroom 1568, Roybal Federal Building, 255 E. Temple Street, Los Angeles, California 90012	

**Type of Sale:** ☒ Public ☐ Private **Last date to file objections:** November 25, 2020

**Description of property to be sold:** Remnant Assets of the Debtor's Estate pursuant to 11 U.S.C. §§ 105 and 363

**Terms and conditions of sale:** \$7,500, cash, free and clear of all liens, claims, interests, and encumbrances  
(see attachment hereto).

**Proposed sale price:** \$7,500 subject to qualified overbids

**Overbid procedure (if any):** See attachment hereto

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**If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:**

December 9, 2020

10:00 a.m.

255 E. Temple Street

Los Angeles, California 90012

Courtroom "1568"

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**Contact person for potential bidders (include name, address, telephone, fax and/or email address):**

Mark S. Horoupian, Esq.

**Sulmeyer**Kupetz, A Professional Corporation

333 South Grand Avenue, Suite 3400

Los Angeles, California 90071

Telephone: 213.626.2311

Email: mhoroupian@sulmeyerlaw.com

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Date: November 16, 2020

## **ATTACHMENT TO NOTICE OF SALE OF ESTATE PROPERTY**

### **Description of Property to be Sold:**

The Trustee's right, title and interest in known or unknown assets or claims, which have not been previously sold, assigned, or transferred (collectively, "Remnant Assets"). Potential unknown assets might include unscheduled refunds, overpayments, deposits, judgments, claims, or other payment rights that would accrue in the future.

### **Bidding Procedures**

While the Trustee is prepared to consummate the sale of the Remnant Assets to Oak Point Partners, LLC ("Oak Point") pursuant to the terms set forth herein and in the Purchase Agreement, in the event a party other than Oak Point (each, a "Competing Bidder") wishes to purchase the Remnant Assets, the Trustee requests that the Court approve the following overbid procedures (collectively, "Bidding Procedures"):

- a. Each Competing Bidder who wants to participate in the overbid process must notify the Trustee of their intention to do so in accordance with the Notice on or before the Response Deadline;
- b. The first overbid for the Remnant Assets by a Competing Bidder must be at least \$1,875 more than the Purchase Price, or a total of \$9,375;
- c. Each Competing Bidder must submit a Cashier's Check to the Trustee in the amount of such Competing Bidder's first overbid at the time such overbid is made;
- d. Each subsequent overbid for the Remnant Assets must be in additional increments of \$1,000, unless otherwise agreed by the parties or directed by the Court;
- e. The bidder must purchase the Remnant Assets under the same terms and conditions set forth in the Purchase Agreement, other than the purchase price; and
- f. In the event of an overbid that meets the foregoing conditions, the Trustee will schedule an auction of the Remnant Assets in advance of the hearing date and will request that the Court approve the winning bidder at the auction as the purchaser at the hearing on the Motion.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

333 South Grand Avenue, Suite 3400, Los Angeles, CA 90071

A true and correct copy of the foregoing document entitled: **NOTICE OF SALE OF ESTATE PROPERTY** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 11/16/2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Jose-Manuel A DeCastro jmdecastro@decastrolawgroup.com, jmdecastro@decastrolawgroup.com  
Howard M Ehrenberg (TR) ehrenbergtrustee@sulmeyerlaw.com, ca25@ecfcbis.com; C123@ecfcbis.com;  
hehrenberg@ecf.inforuptcy.com  
Mark S Horoupian mhoroupian@sulmeyerlaw.com, mhoroupian@ecf.inforuptcy.com; ccaldwell@sulmeyerlaw.com  
Marsha A Houston mhouston@reedsmith.com  
Stephen J Kottmeier skottmeier@hopkinscarley.com, jmeade@hopkinscarley.com  
Scott Lee slee@lbbslaw.com  
Lovee D Sarenas lovee.sarenas@lewisbrisbois.com  
United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov  
Steven Werth swerth@sulmeyerlaw.com, cblair@sulmeyerlaw.com; mviramontes@sulmeyerlaw.com;  
dperez@sulmeyerlaw.com; swerth@ecf.inforuptcy.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* 11/16/2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Raymond Express Int'l, LLC  
5250 W 102nd St  
Los Angeles, CA 90045-6002

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/16/2020	Cheryl Caldwell	/s/Cheryl Caldwell
<u>Date</u>	<u>Printed Name</u>	<u>Signature</u>